

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

BARRY KREMSER,

Plaintiff,

v.

**THE PRUDENTIAL INSURANCE
COMPANY OF AMERICA and
GEISINGER SYSTEM SERVICES,**

Defendants.

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NO. 07-CV-2018

ELECTRONICALLY FILED

: JUDGE JONES

STIPULATION

WHEREAS Plaintiff Barry Kremser initiated the above-captioned action through the filing of a Complaint on or about November 5, 2007;

WHEREAS the parties reached an agreement concerning the filing of an amended complaint which eliminates the state law claims and dismisses Geisinger System Services as a party defendant;

WHEREAS the Honorable John E. Jones entered an Order approving the parties stipulation on January 10, 2008;

WHEREAS pursuant to the Stipulation and Order entered on January 10, 2008 Defendant Geisinger System Services has been dismissed without prejudice;

WHEREAS pursuant to the Stipulation and Order entered on January 10, 2008 Plaintiff Barry Kremser has until February 2, 2008 to file an amended complaint against Defendant Prudential Insurance Company of America and it is not obligated to serve a responsive pleading to the original Complaint;

WHEREAS the amended complaint will remove several of the counts and one of the parties from the original Complaint and thereby streamline the case;

WHEREAS prior to the Stipulation and Order entered on January 10, 2008 the matter had been scheduled for a case management conference for January 30, 2008;

WHEREAS the parties need more time under the circumstances to prepare for the case management conference including assembly of the certain critical information;

IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:

1. The case management conference scheduled for January 30, 2008 is adjourned for 30 days or such other time as the Court deems appropriate.

Respectfully submitted,

/s/ Richard B. Bateman, Jr.
Richard B. Bateman, Jr.
12 Veterans Square
Media, PA 19063

Attorney for Plaintiff,
Barry Kremser

/s/ Michael J. Jones
Michael J. Jones
Four Century Drive
Parsippany, NJ 07054

Attorney for Defendant,
The Prudential Insurance Company of America

Date: January __, 2008

SO ORDERED:

J.